

EXHIBIT 1

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SONOS, INC.,

Plaintiff,

vs.

Case No. 3:21-CV-07559-WHA

GOOGLE LLC,

Defendant.

-AND-

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

GOOGLE LLC,

Plaintiff,

vs.

Case No. 3:20-CV-06754-WHA

SONOS, INC.,

Defendant.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

SOURCE CODE

REMOTE VIDEOTAPED DEPOSITION BY VIRTUAL ZOOM OF

DAN SCHONFELD, PH.D.

Friday, February 3, 2023

Reported By: Lynne Ledanois, CSR 6811

Job No. 5698162

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
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SONOS, INC.,

Plaintiff,

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GOOGLE LLC,

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UNITED STATES DISTRICT COURT
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GOOGLE LLC,

Plaintiff,

vs. Case No. 3:20-CV-06754-WHA
SONOS, INC.,

Defendant.
-----x

Videotaped deposition of DAN SCHONFELD, PH.D.,
taken in Northbrook, Illinois, at 8:13 a.m. CST on
Friday, February 3, 2023, before Lynne Ledanois,
Certified Shorthand Reporter No. 6811.

REMOTE APPEARANCES

Counsel for Sonos LLC:

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BY: MARC KAPLAN

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ALSO PRESENT: John MacDonell, Videographer

Friday, February 3, 2023

8:13 a.m. CST

THE VIDEOGRAPHER: We're on the record.

It's 8:13 a.m. Central time on February 3rd, 2023. 6:13AM

This is the deposition of Dr. Dan
Schonfeld. We're here in the matter of Google
versus Sonos. I'm John MacDonnell, the videographer
with Veritext.

Before the reporter swears the witness, 6:13AM
would counsel please identify themselves beginning
with the noticing attorney, please.

MR. SMITH: Dan Smith from Lee Sullivan
Shea & Smith on behalf of Sonos.

MR. KAPLAN: This is Marc Kaplan from 6:13AM
Quinn Emanuel Urquhart & Sullivan on behalf of
Google.

DAN SCHONFELD, PH.D.,
having been first duly sworn, testified as follows:

EXAMINATION 6:13AM

BY MR. SMITH:

Q Good morning, Dr. Schonfeld.

A Good morning.

Q You understand that you're under oath
today; is that correct? 6:15AM

Page 6

1	A	I do.	6:15AM
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2 Q And you've been deposed many times in the
3 past; is that right?

A I've been deposed many times in the past,
yes.

6:15AM

6 Q So given that, I think we can just jump
7 right in without going through the formal rules of a
8 deposition.

9 Is that okay with you?

10	A	Sure.	6:15AM
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11 Q One more thing before we get going. Can
12 you confirm you don't have any notes in front of you
13 besides copies of your expert reports?

14 A I have hard copies of my expert reports, I
15 have hard copies of the patents and I have hard copies 6:15AM
16 of the demonstratives attached to my expert reports.

17 And I have -- I have a hard copy of the
18 court's order for partial summary judgment.

19 I think I believe that's it.

20 Q You don't have any notes on those 6:16AM

21 documents; is that correct?

22 A No. These are fresh hard copy printouts
23 provided to me by counsel. I have not even looked at
24 them other than to confirm that these are the
25 documents that I asked for.

6:16AM

1 "But the UUID and speaker group name are 2:14PM
2 not a 'zone scene' because they contain no
3 information about the group membership."

4 And then I go on from there. So if one
5 were to take the plain and ordinary meaning of the 2:14PM
6 word "causing storage of the first zone scene," I
7 would say that a person -- a POSITA would generally
8 associate storage with persistent storage and
9 nonvolatile memory or persistent memory.

10 I think that that is the common way in 2:14PM
11 which people use -- for example, when you buy a
12 computer, a PC, a laptop, you're given a number of
13 different parameters such as the CPU speeds, the
14 bandwidth, storage capacity, memory capacity. So
15 memory is usually volatile, storage is nonvolatile. 2:15PM

16 I am aware that the spec sometimes talks
17 about memory, for example, memory 206 for saving
18 configuration files.

19 But my view is that in that context, it's
20 using memory as saving in way that could be used in 2:15PM
21 the future and, therefore, it would have to be
22 persistent storage or nonvolatile storage in my
23 opinion.

24 I think the court's order for the partial
25 summary judgment, if my memory is correct -- I can 2:15PM

1 I, LYNNE M. LEDANOIS, a Certified
2 Shorthand Reporter of the State of California, do
3 hereby certify:

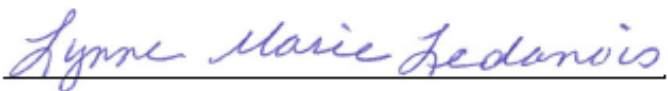
4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that a record of the proceedings was made by me
7 using machine shorthand which was thereafter
8 transcribed under my direction; that the foregoing
9 transcript is a true record of the testimony given.

10 Further, that if the foregoing pertains to
11 the original transcript of a deposition in a Federal
12 Case, before completion of the proceedings, review
13 of the transcript [x] was [] wasn't requested.

14 I further certify I am neither financially
15 interested in the action nor a relative or employee
16 of any attorney or party to this action.

17 IN WITNESS WHEREOF, I have this date
18 subscribed my name.

19 Dated: February 7, 2023
20
21

22 
23

LYNNE MARIE LEDANOIS

24 CSR No. 6811
25

ERRATA SHEET

Case Names: *Google LLC v. Sonos, Inc.*
Case No. 3:20-cv-06754-WHA

Sonos, Inc. v. Google LLC
Case No. 3:21-cv-07559-WHA

Deposition Date: February 3, 2023


Deponent: Dan Schonfeld

I, Dan Schonfeld, do hereby certify that I read the foregoing transcript of my testimony taken on February 3, 2023, and further certify that it is a true and accurate record of my testimony, with the exception of the corrections listed below:

Page	Line	Now Reads	Should Read	Reason
18	22	"in Section XI," in Section 11."	"in Section XI."	Transcription error
19	6-7	"in Section,' 11, 'XI"	"in Section XI"	Transcription error
19	12	"that that"	"is that that"	Transcription error
21	11	"still my opinion."	"still my opinions."	Transcription error
21	18	"Section 11, Section XI,"	"Section XI,"	Transcription error
23	6	"I dent"	"I don't"	Transcription error
25	24	"what specifically"	"what was specifically"	Transcription error
27	6	"what I said,"	"what I said is,"	Transcription error
28	4	"systems can be"	"systems that can be"	Transcription error
30	17	"Sonos forum"	"Sonos forums"	Transcription error
32	12	"do it at all"	"do it all"	Transcription error
33	2	"Sonos forum"	"Sonos forums"	Transcription error
33	13	"Sonos forum"	"Sonos forums"	Transcription error
33	17	"Sonos forum"	"Sonos forums"	Transcription error
35	14	"own speakers."	"all speakers."	Transcription error
36	10	"Sonos forum"	"Sonos forums"	Transcription error
36	19	"continues to"	"continue to"	Transcription error
36	24	"deck speaker"	"deck speakers"	Transcription error
38	14	"requirement to operating"	"requirement to operate"	Transcription error
43	20	"downstairs zone scene"	"the downstairs zone scene"	Transcription error
51	15	"the same answer"	"the same answers"	Transcription error
55	10	"invocation"	"indication"	Transcription error
55	11	"Sonos forum"	"Sonos forums"	Transcription error
56	16	"a created"	"created"	Transcription error

59	13	“Sonos forum”	“Sonos forums”	Transcription error
59	17	“, do it”	“, to do it”	Transcription error
59	21-22	“Sonos forum”	“Sonos forums”	Transcription error
60	6	“Sonos forum”	“Sonos forums”	Transcription error
60	7	“Sonos forum”	“Sonos forums”	Transcription error
61	5	“quote, stupid is not a teach a way”	“quote, stupid, end quote is not teaching a way”	Transcription error
61	8	“suggests”	“suggest”	Transcription error
64	8	“Sonos forum”	“Sonos forums”	Transcription error
64	8	“Sonos forum”	“Sonos forums”	Transcription error
65	21	“we”	“he”	Transcription error
65	24	“Sonos forum”	“Sonos forums”	Transcription error
67	17	“totality operations”	“totality of the operations”	Transcription error
98	24	“talked”	“talked about”	Transcription error
99	16	“would have been a found”	“would have been found”	Transcription error
103	1	“what the”	“that the”	Transcription error
111	1	“should have been done”	“could have been done”	Transcription error
112	3	“Player 2, 2”	“Player 2,”	Transcription error
114	16	“known.”	“no longer.”	Transcription error
114	23	“just two-button”	“just a two-button”	Transcription error
114	25	“different”	“difference”	Transcription error
116	6	“require two-button”	“require a two-button”	Transcription error
120	11	“point out, that”	“point out, is that”	Transcription error
126	11	“Sonos forum”	“Sonos forums”	Transcription error
130	25	“redesign”	“redesigned”	Transcription error
131	19	“compete”	“complete”	Transcription error
133	14	“before finish”	“before I finish”	Transcription error
149	3	“stopped”	“it is stopped”	Transcription error
150	7	“standalone mode”	“in standalone mode”	Transcription error
151	15	“more interpretation”	“my interpretation”	Transcription error
158	4	“individually and”	“individually. And”	Transcription error
158	4-5	“to -- you can operate”	“to operate”	Transcription error
161	18	“shutdown”	“showdown”	Transcription error
175	9	“you’re still”	“you’d still”	Transcription error
176	19	“in 2022 less, than”	“in 2022, less than”	Transcription error
179	20	“correctly.”	“currently.”	Transcription error
184	2	“Sonos in both”	“Sonos on both”	Transcription error
196	11	“statued”	“status”	Transcription error
204	14	“they are do not”	“they do not”	Transcription error

Dated: March 8, 2023

By: 
Dan Schonfeld